

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH CAROLINA  
CASE NO. 5:20-CV -230**

----- X  
CAMERON CAIN BAARBÉ, *et al.*,

Plaintiffs,

-against-

THE SYRIAN ARAB REPUBLIC,

Defendant.

----- X

**DECLARATION OF RON GREENFIELD**

**RON GREENFIELD**, pursuant to 28 U.S.C. § 1746, declares and states as follows subject to the penalties for perjury of the United States of America:

1. I am a United States citizen domiciled in Israel.
2. I recall the terror attack in Istanbul, Turkey as if it happened yesterday. I had registered for a very interesting sounding four-day culinary tour of Istanbul, Turkey as a gift for my wife's birthday. It seemed like a very special trip. My wife's sister, Anat, decided to come on the tour with us. The first days were really compelling and it was a lot of fun.
3. Unfortunately, on the third day of the tour, March 19, 2016, things took a terrible turn for the worse. As the group was walking down a pedestrian road in Istanbul and my wife Pnina walked a little ahead to take photographs of the group. I was walking at the left of the line of our tourist group. I accelerated my walking to catch up with Pnina to talk to her, which I later realized saved me from being closer to the blast. Just a few seconds later there was a massive explosion that shook up our entire world.



4. A terrorist had mingled with the group and detonated a powerful bomb he had been concealing. We had no forewarning that the explosion was coming. Three of the people in the tour group died at the scene and everyone else, except one person, was seriously. I was badly hit by shrapnel in my feet. When the explosion occurred everything went black and dusty and hazy. My wife Pnina shouted, "Where is Ron?" I could hear her voice but had no idea where she was. It was devastating and frightening. I recall falling to the ground due to the blast. I tried to get up and saw that members of the tour group were lying on the ground scattered all over the street. Many were grievously wounded around me. It was a horrific scene of dead and wounded people, like a battlefield.

5. I crawled and limped to Pnina who I saw was in a nearby alley where she had gone for protection after the blast. Pnina, Anat and myself all sat there, on the ground, in shock and in physical pain. My ears were ringing horribly and I felt my eardrums had been shattered. To this day I still have tinnitus. While in the alley way, I noticed that my new sneakers were torn, and my foot was seriously bleeding. I was in such shock and overwhelmed by the situation so I did not even think to tie a tourniquet around my foot to stop the bleeding. Pnina was also bleeding from her leg. We sat there in pain and confusion not knowing what would happen next. We knew we needed emergency care. After 15 minutes I was taken by ambulance to the hospital where my foot was bandaged.

6. I was so confused and shocked by the situation. I had never thought I would be the victim of a terror attack, especially while in a foreign country. It was very disorienting and we could not get an accurate understanding of what had occurred. We knew several people on our tour, who had traveled with just hours earlier, were dead. Everyone else, like us, was trying to get medical attention. Everyone wanted to leave the country and return home as fast as possible. We



were all in a traumatic state. My son and brother-in-law flew to Turkey to be with us and arrange to get us back home, and later that night I was flown to Israel in a special plane sent by the Israeli government. I was frightened by the entire ordeal and only felt relieved when I was back in Israel the next day. I remained in a hospital in Israel for a week and I was discharged from the hospital in a wheelchair with a cast on my leg.

7. I wore a cast on my leg for three months and this severely limited my mobility, which in turn caused a great deal of physical and emotional discomfort. My children were very involved in my care during my recovery, which was challenging for them and for me. It was degrading and embarrassing to need my children's help going to the bathroom, showering, and getting dressed. For my children, seeing my wife and me in such vulnerable states was traumatic and it left a long-term impression.

8. At the time of the attack, I was working as a bookkeeper full-time at a gas company, but I was unable to return to work after the terror attack because of my physical limitations and emotional struggles. I never returned to my job. I was deemed 49% disabled by Israel's social security authorities. Before the attack, I enjoyed running, going to the gym, sporting activities and a vibrant social life, but all this ended abruptly after the attack. My physical limitations and emotional struggles made it difficult to return to my physically and socially active life. I went so quickly from being a healthy active person to be one with severe restrictions. Due to my physical limitations, I lost the self-confidence that I had once had. Additionally, as my wife and I were both homebound, new tensions began to arise in our relationship, which further added to the stress and sadness we were both experiencing in the wake of the attack.

9. Shortly after the terror attack, I began experiencing post-traumatic symptoms. I experienced nightmares and difficulty sleeping, avoided leaving the house for non-essential



activities, became hypervigilant in public places and became hypersensitive to noises and loud sounds. I experience a physiological reaction when I am reminded of the terror attack that includes sweating and hyperventilation. Today, I still struggle to enjoy activities outside of my home. The noises and loud sounds of cities, including the city we live in, are still difficult for me and affect my function at times. I am just no longer the same person.

10. I was treated by a psychologist for six months and met with a psychiatrist who prescribed sleep medication and medication for my low mood and post-traumatic anxiety. I also tried alternative treatments, including reflexology and acupuncture, for my physical and emotional pain, but such treatments did not work.

11. My mood, stability, and quality of life have all changed drastically because of the attack. The attack left my entire family with shock, pain and trauma that still impacts us all. Though I experience joy through my connections with my wife, children, and grandchildren, I have become a much grimmer person since the attack and struggle to function and live happily. It is unbelievable that in an instant my life was so horribly impacted. In a brief moment everything changed for my family and we are facing the challenges that this terrorist attack inflicted upon us. I try very hard to stay strong and positive for my wife, children and myself but it is a daily struggle. I realize that I have no choice but to continue on and persevere but it takes all my physical and emotional strength to do so.

12. Attached hereto as Exhibit A is a photograph of the tour group before the terror attack.

13. Attached hereto as Exhibit B is a photograph from a family vacation before the terror attack.



activities, became hypervigilant in public places and became hypersensitive to noises and loud sounds. I experience a physiological reaction when I am reminded of the terror attack that includes sweating and hyperventilation. Today, I still struggle to enjoy activities outside of my home. The noises and loud sounds of cities, including the city we live in, are still difficult for me and affect my function at times. I am just no longer the same person.

10. I was treated by a psychologist for six months and met with a psychiatrist who prescribed sleep medication and medication for my low mood and post-traumatic anxiety. I also tried alternative treatments, including reflexology and acupuncture, for my physical and emotional pain, but such treatments did not work.

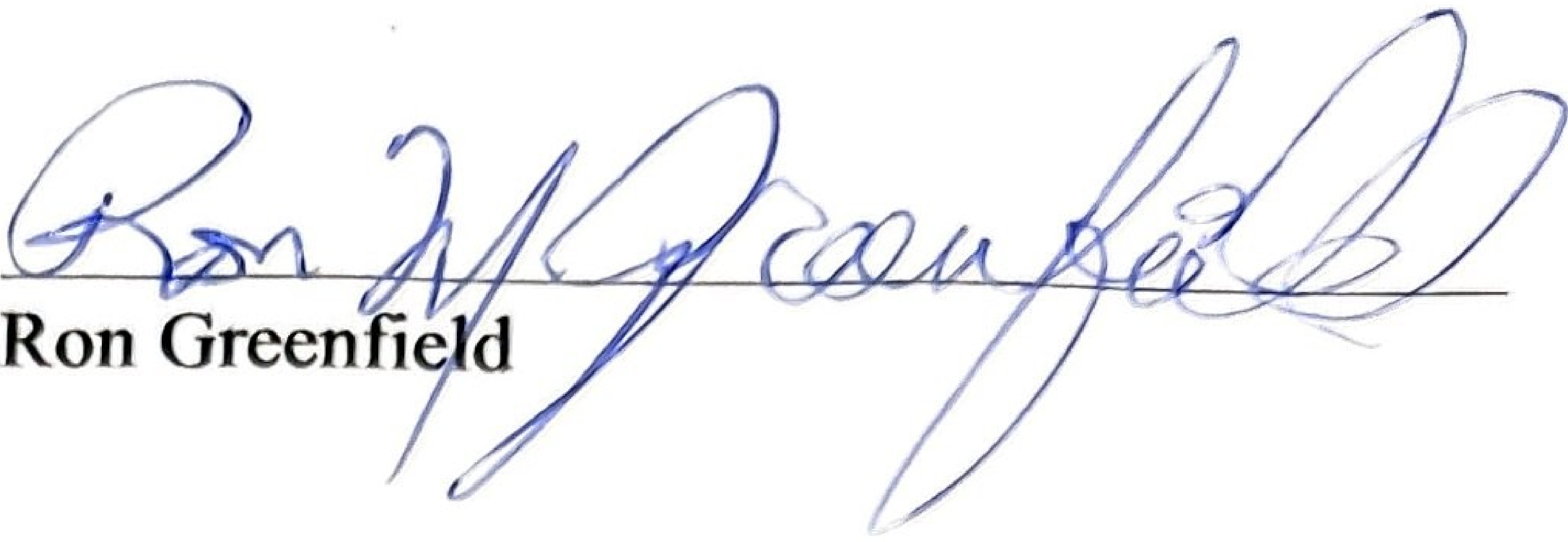
11. My mood, stability, and quality of life have all changed drastically because of the attack. The attack left my entire family with shock, pain and trauma that still impacts us all. Though I experience joy through my connections with my wife, children, and grandchildren, I have become a much grimmer person since the attack and struggle to function and live happily. It is unbelievable that in an instant my life was so horribly impacted. In a brief moment everything changed for my family and we are facing the challenges that this terrorist attack inflicted upon us. I try very hard to stay strong and positive for my wife, children and myself but it is a daily struggle. I realize that I have no choice but to continue on and persevere but it takes all my physical and emotional strength to do so.

12. Attached hereto as Exhibit A is a photograph of the tour group before the terror attack.

13. Attached hereto as Exhibit B is a photograph from a family vacation before the terror attack.

14. Attached hereto as Exhibits C-M are photographs of my injuries, of me trying to walk with a walker and of me and Pnina in wheelchairs after the terror attack.

Dated: May 16, 2023

  
Ron Greenfield



### **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **Declaration of Ron Greenfield** was electronically filed this the 22<sup>nd</sup> day of May 2023 with the Clerk of Court using the CM/ECF system. Parties may access this filing through the Court's Electronic Filing System.

#### **SHANAHAN LAW GROUP, PLLC**

By: /s/ Kieran J. Shanahan  
Kieran J. Shanahan, NCSB # 13329  
128 E. Hargett Street, Suite 300  
Raleigh, North Carolina 27601  
Telephone: (919) 856-9494  
[kieran@shanahanlawgroup.com](mailto:kieran@shanahanlawgroup.com)  
*Local Rule 83.1 Counsel*  
*Attorney for Plaintiffs*

Robert J. Tolchin, NY Reg.# 2546596  
The Berkman Law Office, PLLC  
829 East 15<sup>th</sup> Street, Box 7  
Brooklyn, New York 11230  
Telephone: (718) 855-3627  
[rtolchin@berkmanlaw.com](mailto:rtolchin@berkmanlaw.com)  
*Attorney for Plaintiffs*